

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TVB HOLDINGS (USA), INC. and DISH
NETWORK L.L.C.,

Plaintiffs,

v.

GRAND STREET PHARMACEUTICAL
LLC d/b/a BUY-RITE PHARMACY IV,

Defendant.

USDS SDNY
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DATE FILED: 4/27/16

CIVIL ACTION NO. 15-CV-9521 (PGG)

**STIPULATION FOR ENTRY OF
~~CONSENT JUDGMENT~~ CONSENT JUDGMENT
AND PERMANENT INJUNCTION**

This Stipulation is entered by and between Plaintiffs TVB Holdings (USA), Inc. and DISH Network L.L.C. (collectively, "Plaintiffs") and Defendant Grand Street Pharmaceutical LLC d/b/a Buy-Rite Pharmacy IV ("Defendant," and together with Plaintiffs, the "Parties") through their respective counsel of record, with reference to the following facts:

1. Plaintiffs filed the Complaint in this action on December 4, 2015, against Defendant with a claim for copyright infringement under the copyright laws of the United States, 17 U.S.C. § 101 *et seq.*
2. Plaintiffs and Defendant have agreed to resolve their dispute, and have entered into a Settlement Agreement wherein Defendant has agreed to entry of a consent judgment and permanent injunctive relief in favor of Plaintiffs and in accordance with other terms as set forth in the Settlement Agreement.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED that:

1. A true and correct copy of the Consent Judgment and Permanent Injunction agreed to by the parties pursuant to this Stipulation and the Parties' Settlement Agreement (the "Consent Judgment") is attached hereto as **Exhibit 1**;
2. The Parties agree that all facts set forth in the Consent Judgment are true and accurate to their best knowledge and support entry of the Consent Judgment;

3. Defendant agrees to be bound by and abide by all permanent injunctive relief set forth in the Consent Judgment entered by the Court;

4. The Parties hereby enter into this Stipulation with the advice of counsel knowing its content and effect;

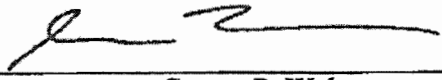
5. The Parties request that the Court enter the Consent Judgment in the form attached as **Exhibit 1**; and

6. The Parties request the Court retain jurisdiction to enforce the Consent Judgment, once entered, as required.

So Stipulated.

DATED: April 26, 2016

DAVIS WRIGHT TREMAINE LLP
LACY H. KOONCE, III
GEORGE WUKOSON

By: 
George P. Wukoson

Attorneys for Plaintiffs
TVB HOLDINGS (USA), INC.; AND DISH
NETWORK L.L.C.

DATED: April 26, 2016

MISKIN & TSUI-YIP, LLP

By: 
Gloria Tsui-Yip

Attorneys for Defendant
GRAND STREET PHARMACEUTICAL LLC d/b/a
BUY-RITE PHARMACY IV